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September 15, 2021

Via ECF

Hon. Barbara C. Moses
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

RE: Cash Smith v. Kijakazi
21-cv-1105-VSB-BCM

Dear Judge Moses:

I am writing to request an extension of time in which to file plaintiff's settlement proposal in this case. Plaintiff's settlement proposal is due today. This is plaintiff's first request for an extension of time.

I seek additional time to complete plaintiff's settlement proposal due to a significant backlog in my workload caused by illness during the prior two weeks. Despite being fully vaccinated, I contracted Covid 19 in late August and experienced significant fatigue in the last week of August and the first week of September. This significantly impacted my stamina and ability to keep pace with my work schedule, including Ms. Cash-Smith's papers. I apologize for the delay and disruption to your schedule. With the kind consent of opposing counsel, SAUSA Ariella Zoltan, I respectfully request that the Court approve the following revised briefing schedule:

September 30, 2021	Plaintiff's Settlement Proposal
November 1, 2021	Remand Stipulation Or non-Settlement letter
December 1, 2021	Plaintiff's Motion for Judgment on the Pleadings
January 31, 2022	Defendant's Motion for Judgment on the Pleadings
February 21, 2022	Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

/s/ Christopher J. Bowes, Esq.
Christopher J. Bowes, Esq.

cc: SAUSA Ariella Zoltan

Application GRANTED. SO ORDERED.

Barbara Moses
United States Magistrate Judge
September 16, 2021